

*made out
6-11-91*

ADVISORY

NOTICE OF RULE ADOPTION RULE 67.9 - AEROSPACE COATING OPERATIONS (Amendment)

The Air Pollution Control Board adopted amendments to Rule 67.9 which became effective May 21, 1991. Rule 67.9 is an existing rule regulating emissions from aerospace coating operations. The amendments will correct deficiencies identified by the Environmental Protection Agency in the current rule as well as include revisions to solvent limits for certain specialty coatings. The amendments will accomplish the following:

- Make the requirements of Rule 67.9 applicable to the cleaning of aerospace component, and the cleaning of coating application equipment.
- Add exemptions for prepreg composite materials, touch-up coatings, stencil coatings, coatings applied using non-refillable handheld aerosol spray containers, and coatings used exclusively for research and development if not more than 50 gallons of such coatings per year are used.
- Delete the exemption for spray booths or rooms where not more than one gallon per day of coating is used.
- Revise the VOC definition to be consistent with other District rules and EPA requirements. Add additional compounds that are exempt from regulation because they are not ozone precursors. Clarify that VOC limits are "less water and exempt compounds".
- Revise VOC limits for certain coating categories and add new coating categories with associated VOC limits. Future effective dates for lower VOC limits for certain coatings have also been specified. Associated definitions have been added and revised.
- Revise VOC limits for maskants.
- Require the use of specified high transfer efficiency application equipment for coatings. Applications using small airbrushes would be exempt.
- Add requirements for coating strippers.
- Revise requirements for materials used for surface preparation or cleaning.
- Revise requirements for the clean-up of coating application equipment, to be consistent with other District rules.
- Add a prohibition against specifying the application of a coating if such application would result in a violation of Rule 67.9.

Advisory - Rule 67.9

Page 2

- Add a requirement (effective six months from date of adoption) that a list of all aerospace coatings applied in each affected facility be provided to the Air Pollution Control Officer (APCO). The list shall also identify for each aerospace coating all applicable category uses including allowable VOC content.
- Add a prohibition against reformulating a coating to increase the methylene chloride or CFC content. The methylene chloride and CFC content of coatings must be shown on coating containers (to be effective in 1 year).
- Delete current requirements for equivalency plans (if used) and refer to new requirements contained in new District Rule 67.1 (Alternative Emission Control Plans).
- Specify control equipment requirements (if used for compliance), consistent with other District rules.
- Add requirements that records be kept on a daily basis and maintained for at least three years. The requirement for daily records will not apply to adhesives and sealants having a VOC content of less than 250 g/l and adhesives and sealants applied in areas not required to have District permits provided annual usage records are maintained.
- Specify test methods that will be used to determine compliance with the rule.

If you would like a copy of the rule, call Juanita Ogata at (619) 694-3307. If you have any questions concerning this Advisory, contact the District's Enforcement Division at (619) 694-3340.

RGS:jo
052191